

66330-368



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Bill Washburn  
Arysta LifeScience North America Corporation  
15401 Weston Parkway, Suite 150  
Cary, NC 27513

JUL 16 2008

Dear Mr. Washburn:

Subject: Labeling Amendment; Revised PPE Section  
Aloft LC G Insecticide  
EPA Registration No. 66330-368  
Submission Date: July 16, 2008

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this label, please contact me at (703) 306-0415.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", written over a horizontal line.

Kable Bo Davis  
Entomologist  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

Enclosure



# ALOFT™ LC G INSECTICIDE

GROUP	4A	INSECTICIDE
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GROUP	3	INSECTICIDE
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For contact and systemic insect pest control in lawns and landscape ornamentals around residential, institutional, public, commercial and industrial buildings, parks, recreational areas, and athletic fields. Not for use on golf courses and sod farms.

INGREDIENTS	By wt.
Active Ingredients:	
Clothianidin*	0.25%
Bifenthrin**	0.125%
Other Ingredients:	99.625%
Total:	100.00%

\*(E)-1-(2-chloro-1,3-thiazol-5-ylmethyl)-3-methyl-2-nitroguanidine

\*\* 2-methylbiphenyl-3-ylmethyl (1RS,3RS)-3-[(Z)-2-chloro-3,3,3-trifluoroprop-1-enyl]-2,2-dimethylcyclopropanecarboxylate (cis isomers 97% minimum, trans isomers 3% maximum)

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See inside booklet for additional precautionary statements

EPA Registration No. 66330-368

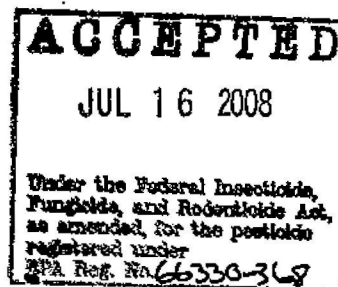
EPA Est. No. \_\_\_\_\_

Produced for:

Arysta LifeScience North America Corporation  
15401 Weston Parkway, Suite 150  
Cary, NC 27513

For Product Use Information, call 1-866-761-9397

Net Contents:



<b>FIRST AID</b>	
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p><b>NOTE TO PHYSICIAN:</b> This pesticide contains a pyrethroid. If significant quantities have been swallowed, promptly eliminate the ingested quantities from the stomach and intestines. Treatment is symptomatic and supportive. Alcohol, milk, cream, and other digestible fats and oils should NOT be administered as they may increase absorption.</p>	
<p align="center"><b>HOTLINE NUMBER</b></p> <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. <b>FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL PROSAR at 1-866-303-6952.</b></p>	

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear protective eyewear. Wear: long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves (such as Natural Rubber, Selection Category A).

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some of the materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart. Applicators and other handlers must wear:

- long-sleeved shirt and long pants
- shoes plus socks
- chemical-resistant gloves
- protective eyewear

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no instructions for washables are available, use detergent and hot water. Keep and wash PPE separately from other laundry.

### USER SAFETY RECOMMENDATIONS

Users should:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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## ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not apply where runoff is likely to occur. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters or rinsate.

This product is toxic to bees exposed to treatment and for more than 5 days following treatment. Do not apply this product to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period, unless the application is made in response to a public health emergency declared by appropriate state or federal authorities.

## DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Carefully read and understand the Directions for Use and restrictions before applying this product.

Do not apply this product in any way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Apply using ground equipment only; do not apply by air.

Do not apply on the following: nurseries, commercial greenhouses, grass grown for seed, golf courses and sod farms.

## GENERAL INFORMATION

**ALOFT™ LC G** is a broad spectrum, long lasting contact and systemic insecticide for control of insects infesting lawns and ornamentals in landscapes and surrounding areas. **ALOFT LC G** can be used around residences, business complexes, industrial complexes, airports, playgrounds, school yards, parks and recreation areas, athletic fields, cemeteries, arboretums, and non-production greenhouses.

## RESISTANCE MANAGEMENT

The active ingredients in **ALOFT LC G** are clothianidin, a Group 4A insecticide, and bifenthrin a Group 3 insecticide. Insect biotypes with acquired resistance to Group 4A or Group 3 insecticides may eventually dominate the insect population if Group 4A or Group 3 insecticides are used alone or repeatedly in the same site or in successive years as the primary method of control for targeted species.

To delay insecticide resistance in insects that are at risk of developing resistance to insecticides consider:

- Avoid the consecutive use of insecticides in the same group on the same insect species.
- Use tank-mixtures or pre-mixes of insecticides from a different target site of action.
- Base insecticide use on a comprehensive IPM program.
- Monitor treated insect populations for loss of field efficacy.
- Contact your State Agricultural Experiment Station, State Extension Specialists, other lawn experts and/or Arysta LifeScience North America Corporation for insecticide resistance management and/or IPM recommendations for the specific site and resistant pest problems.
- For further information or to report suspected resistance, you may contact Arysta LifeScience North America Corporation at 1-866-761-9397.

## APPLICATION EQUIPMENT

Apply **ALOFT LC G** uniformly over the area being treated with standard granular application equipment. Use either drop-type or rotary-type spreaders to apply **ALOFT LC G**.

Avoid the use of spreaders which would apply the material in narrow, concentrated bands. Calibrate application equipment prior to use according to the manufacturer's directions. Check frequently to be sure equipment is working properly and distributing granules uniformly and accurately. In order to insure continuing delivery of the correct amount of **ALOFT LC G** further adjustments to the settings should be made periodically during application.

#### **APPLICATION INSTRUCTIONS – TURFGRASS AND PERIMETERS AROUND LAWNS AND LANDSCAPED AREAS**

**ALOFT LC G** can be used for broad spectrum insect control in lawns and perimeters of lawns. **ALOFT LC G** can be used around residences, business complexes, industrial complexes, airports, playgrounds, school yards, parks and recreation areas, athletic fields, cemeteries and other similar areas.

**ALOFT LC G** has sufficient contact and residual activity to provide high levels of control. The need for an application can be based on historical monitoring of the presence of or anticipated occurrence of individual or multiple insect pest species, the site, previous records or experiences, current season adult trapping or other methods. Optimum control of white grubs will be achieved when applications are made just prior to egg laying or to early instar larvae of target pests, followed by sufficient irrigation or rainfall to move the active ingredient into the zone where the insect pests are active. Multiple applications can be made each growing season but do not use more than 160 lbs of product (0.4 lb of clothianidin active ingredient, 0.2 lb bifenthrin) per acre per year. Note: You may also use additional products containing bifenthrin as long as the maximum amount of bifenthrin does not exceed 0.4 lbs active ingredient per acre per season for use in lawns and perimeters.

**ALOFT LC G** can be applied to lawns and perimeters at 80 - 160 lbs per acre per year (1.8 – 3.6 lbs/1000 sq ft). The rate is dependent on the target pest(s), their stage of development and the desired level of control. Optimum control of white grubs (larvae) will be achieved when applications are made just prior to or just after peak egg laying. Higher rates should be used when long residual control is desired for control of multiple insect pests or late season curative (rescue) applications are made to lawns already showing grub damage or damage due to scavenging of animals. Multiple applications can be made but do not exceed the maximum amount per year (160 lbs/acre or 3.6 lbs/1,000 sq ft). Consult your local State Agricultural Experiment Station, State Extension Turf Specialists or other lawn experts for specific information concerning the timing of applications.

For early season control of insect pests (such as annual bluegrass weevil) and for control of white grubs, make the first application of **ALOFT LC G** at peak adult activity or when other insect pests reach a damaging population in the spring at a rate of 100 – 160 lbs per acre (2.3 – 3.6 lbs/1000 sq ft). For control of white grubs at standard application timing, apply 80 – 160 lbs per acre (1.8 – 3.6 lbs/1000 sq ft) just prior peak adult activity or to early instar larvae.

For control of surface insects, do not water in until at least 24 hours after application. If the target insects are in the thatch, lightly water in after application with enough water to wet the thatch zone. For control of armyworms, cutworms and other surface feeders, apply 80 – 160 lbs per acre (1.8 – 3.6 lbs/1000 sq ft) at the first sign of insects or insect damage. Repeat the application as needed to control additional flushes of insects. Up to a total of 160 lbs per acre per year (3.6 lbs/1,000 sq ft) can be applied.

For control of existing grub populations, water in after application with enough water to move the insecticide into the zone where the grubs are feeding.

Avoid mowing lawn until after irrigation or rainfall has occurred so that uniformity of application will not be affected.

<b>TURFGRASS AND PERIMETERS AROUND LAWNS</b>
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TURFGRASS AND PERIMETERS AROUND LAWNS	
APPLICATION RATE	INSECT PEST
1.8 – 3.6 lbs per 1,000 sq. ft. (80-160 lbs per acre)	Annual Bluegrass Weevil (Adults) <sup>1</sup> Annual Bluegrass Weevil (Larvae) <sup>1</sup> Ants, Nuisance (Excluding fire, harvester, pharaoh, and carpenter ants) Armyworms Billbugs <sup>2</sup> Black Turfgrass Ataenius <sup>3</sup> Chinch Bugs Cutworms European Crane Fly Grasshoppers Leafhoppers Mole Crickets <sup>4</sup> Pillbugs Sod webworms Sowbugs Spittle bug Sugarcane grub White grubs (Asiatic Garden Beetle, European Chafer, Green June Beetle, Japanese Beetle, Northern Masked Chafer, <i>Phyllophaga</i> spp. (May or June Beetle), Oriental Beetle, Southern Masked Chafer)
<p><sup>1</sup> <b>Annual Bluegrass Weevil:</b> Application can be timed for adult weevils as they move from their over-wintering sites into turf. This movement usually begins before or when Forsythia is in full bloom and continues to full bloom of dogwoods. Larvae from adult weevils that escape the application will be controlled with the application directed at adult weevils. Applications made after adult weevil activity will control larvae. Consult your State Cooperative Extension Service for more specific information regarding timing of application. White grubs will be controlled with an application targeted towards Annual Bluegrass Weevil.</p> <p><sup>2</sup> <b>Billbugs:</b> Application can be made when adult Billbugs are first observed, usually in April and May in temperate regions. A spring application will also control Billbug larvae. Consult your State Cooperative Extension Service for more specific information regarding timing of application. White grubs will be controlled with an application targeted towards Billbugs.</p> <p><sup>3</sup> <b>Black Turfgrass Ataenius:</b> Application can be timed to coincide with the first generation of Black Turfgrass Ataenius that usually appears during May. White grubs will be controlled with an application targeted towards Black Turfgrass Ataenius.</p> <p><sup>4</sup> <b>Mole Crickets:</b> Application should be made during peak adult flight and egg lay. If the soil is dry, irrigate before application to stimulate insect activity and water after application to release the insecticide from the granule carrier.</p>	
<p><b>NOTE</b></p> <ul style="list-style-type: none"> <li>Do not apply more than a total of 160 lbs of <b>ALOFT LC G</b> (0.4 lb of clothianidin active ingredient, 0.2 lb bifenthrin) per acre per season.</li> <li>If the maximum season limit of <b>ALOFT LC G</b> has been applied and pest populations require additional treatments, use another pesticide labeled for control of the targeted insects that does not contain clothianidin. You may use additional products containing bifenthrin as long as the maximum amount of bifenthrin does not exceed 0.4 lbs active ingredient per acre per season for</li> </ul>	

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<b>TURFGRASS AND PERIMETERS AROUND LAWNS</b>
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use in lawns and perimeters.
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**APPLICATION INSTRUCTIONS – LANDSCAPE ORNAMENTALS**

**ALOFT LC G** is a broad spectrum, contact and long lasting systemic insect control product for a wide spectrum of insects infesting landscape ornamentals. **ALOFT LC G** can be used around residences, business complexes, industrial complexes, airports, playgrounds, school yards, parks and recreation areas, athletic fields, cemeteries, arboretums and non-production greenhouses.

For control of surface insects and insects that crawl along the surface of the soil or mulch under ornamentals, water in lightly after application to move the insecticide into the areas where insects are active. Water in with enough irrigation or rainfall to move the active ingredient into the zone where the target insects are active. Soil surface applications will provide control of foliage feeding insects; however, optimum control will not be achieved until the active ingredient is taken up by the plant roots and translocated to the area where insects are feeding.

LANDSCAPE ORNAMENTALS		
SOIL SURFACE or MULCH APPLICATION	SOIL INSECT PEST	APPLICATION INSTRUCTIONS
1.8 – 3.6 lb per 1,000 sq ft  (80 – 160 lb per acre)	<div style="display: flex; justify-content: space-between;"> <div> Ants, Nuisance (Excluding fire, harvester, pharaoh, and carpenter ants) Beet Armyworm Beetles Black Vine Weevils (Adults) Centipedes Crickets Cutworms Diaprepes (Adults) Earwigs Fall Armyworms Grasshoppers Millipedes </div> <div> Pillbugs White grubs (Asiatic Garden Beetle, European Chafer, Green June Beetle, Japanese Beetle, Northern Masked Chafer, <i>Phyllophaga</i> spp. (May or June Beetle), Oriental Beetle, Southern Masked Chafer) </div> </div>	Apply in enough water to wet the areas where the insects are active or water in after application with enough irrigation to move the insecticide into the areas where insects are active.

LANDSCAPE ORNAMENTALS		
SOIL SURFACE or MULCH APPLICATION	ABOVE GROUND INSECT PEST	APPLICATION INSTRUCTIONS
3 – 3.6 lb per 1,000 sq ft (132 – 160 lb per acre)	Aphids Azalea lace bug Caterpillars Flea Beetles Florida wax scale Glassy winged sharpshooter Gypsy Moth Caterpillars Japanese Beetles (Adults) Leafhoppers Leafminers Leafrollers Mealybugs Plant Bugs (Incl. <i>Lygus</i> spp) Root Weevils (Incl. Black Vine Weevils) Scales, Soft Whiteflies	Apply in enough water to wet the root zone of the plants. Control of leaf feeding insects will be delayed until the insecticide is taken up by the roots and moved into the areas where insects are feeding, usually 2-4 weeks.

**NOTE**

- Do not apply more than a total of 160 lbs of **ALOFT LC G** (0.4 lb of clothianidin active ingredient, 0.2 lb bifenthrin) per acre per season.
- If the maximum season limit of **ALOFT LC G** has been applied and pest populations require additional treatments, use another pesticide labeled for control of the targeted insects that does not contain clothianidin. You may use additional products containing bifenthrin as long as the maximum amount of bifenthrin does not exceed 0.4 lbs active ingredient per acre per season for use in lawns and perimeters.

When treating perimeters of structures, make the application to the ground from 5-10 feet adjacent to the structure.

FOR PERIMETER APPLICATIONS									
Appl. Rate: Lbs/f,000 sq ft	Band Width in Feet	Lbs of ALOFT LC G/ Linear Distance (Feet) Around Structure							
		100	150	200	250	300	400	500	1,000
1.8	5	1	1.5	2	2.5	3	4	5	10
2.4	5	1.4	2	2.8	3.5	4.2	5.6	7	14
2.8	10	3	4.5	6	7.5	9	12	15	30
3.6	5	2	3	4	5	6	8	10	20
3.6	10	3.6	5.4	7.2	9	10.8	14.4	18	36

**NOTE:** This table provides amounts which include the total area to be treated. This area includes the area of a circle whose radius is the bandwidth (this accounts for the area treated at the four corners of the structure) plus the linear distance treated times the bandwidth.



### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in a cool, dry place away from excessive heat. Do not store near food, feed, fertilizers, seeds, or other pesticides. Keep this product out of reach of children and animals at all times. Store in original container only. Open the product container carefully and after use, seal tightly.

**To contain a spill:** Cover the spilled product to prevent the material from spreading. If the product container is damaged, place the entire container along with the product in a secure receptacle and clearly label the contents.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:**

Paper and plastic bags: Completely empty bag into application equipment. Then dispose of in a sanitary landfill, or (if allowed by State and local authorities) by burning. If burned, stay out of smoke.

**FOR 24-HOUR CHEMICAL EMERGENCY (Spill, Leak, Fire or Accident) ASSISTANCE:** Call CHEMTREC at 1-800-424-9300.

### Warranty and Disclaimer Statement

The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Such risks may arise from weather conditions, soil factors, off-target movement, unconventional farming techniques, the presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Arysta LifeScience North America Corporation ("Arysta"), and can cause crop injury, injury to non-target crops or plants, ineffectiveness of the product, or other unintended consequences. All such risks shall be assumed by the user or buyer.

Arysta warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions.

This warranty does not extend to the use of this product contrary to label instructions or under conditions not reasonably foreseeable to Arysta, and is subject to the inherent risks described above.

**TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARYSTA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARYSTA, MANUFACTURER, AND SELLER DISCLAIM AND SHALL NOT BE LIABLE FOR ANY SPECIAL, INCIDENTAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE, HANDLING, APPLICATION, STORAGE, OR DISPOSAL OF THIS PRODUCT OR FOR DAMAGES IN THE NATURE OF PENALTIES, AND THE USER AND BUYER WAIVE ANY RIGHT THAT THEY MAY HAVE TO SUCH DAMAGES. NO AGENT, REPRESENTATIVE OR EMPLOYEE OF ARYSTA IS AUTHORIZED TO MAKE ANY WARRANTY, GUARANTEE OR REPRESENTATION BEYOND THOSE CONTAINED HEREIN OR TO MODIFY THE WARRANTIES CONTAINED HEREIN.**

**TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE TOTAL LIABILITY OF ARYSTA, MANUFACTURER, AND SELLER, SHALL BE LIMITED TO THE PURCHASE PRICE PAID, OR AT ARYSTA'S ELECTION, THE REPLACEMENT OF THE PRODUCT.**

ALOPT™ is a trademark of Arysta LifeScience North America Corporation.





"WASHBURN, Bill"  
<Bill.Washburn@arystallifesci  
ence.com>  
07/16/2008 09:16 AM

To Kable Davis/DC/USEPA/US@EPA  
cc "DYKES, Jan" <Jan.Dykes@arystallifescience.com>,  
"RHODES, Becky" <Becky.Rhodes@arystallifescience.com>  
bcc

Subject RE: FW: Aloft - EPA Registration Numbers: 66330-365,  
66330-366, 66330-367 and 66330-368

History: This message has been replied to.

Bo,

Here are the revised labels per your instruction below. I still need to call you about those Dimethoate revisions. What does your schedule look like after lunch?

Thanks for all your help.

Regards,

Bill Washburn  
Regulatory Manager

Arysta Lifescience North America Corporation  
530 Oak Court Drive, Suite 100  
Memphis, TN 38117

Tel 901.432.5118  
Fax 901.432.5031

-----Original Message-----

From: Davis.Kable@epamail.epa.gov [mailto:Davis.Kable@epamail.epa.gov]  
Sent: Wednesday, July 16, 2008 5:28 AM  
To: WASHBURN, Bill  
Subject: Re: FW: Aloft - EPA Registration Numbers: 66330-365, 66330-366, 66330-367 and 66330-368

Bill.....Please email me the revised labels. I will send you the stamped labels and acceptance letters via email once I complete my review. I will also contact the state and let them know that the issue has been resolved.

Thanks!!!

Bo

"WASHBURN, Bill"  
<Bill.Washburn@arystallifescience.com>

07/15/2008 03:09  
PM

To  
Kable Davis/DC/USEPA/US@EPA  
cc  
Subject  
FW: Aloft - EPA Registration  
Numbers: 66330-365, 66330-366,  
66330-367 and 66330-368

Insecticide-Rodenticide Branch  
Registration Division (7505P)  
1200 Pennsylvania Ave. NW  
Washington, DC 20460

Tel: 703 306-0415  
Fax: 703 305-6596  
Email: davis.kable@epa.gov



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066330-00365.20080715.PPE Revision.pdf



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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Doina Bujor  
Arysta LifeScience North America Corporation  
15401 Weston Parkway, Suite 150  
Cary, NC 27513

DEC 28 2007

Dear Ms. Bujor:

Subject: Labeling Amendment; Revised Directions for Use  
Aloft LC G Insecticide  
EPA Registration No. 66330-368  
Submission Date: December 12, 2007

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this label, please contact me at (703) 306-0415.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", written over a horizontal line.

Kable Bo Davis  
Entomologist  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

Enclosure

**ALOFT™ LC G**  
**INSECTICIDE**

GROUP	4A	INSECTICIDE
GROUP	3	INSECTICIDE

For contact and systemic insect pest control in lawns and landscape ornamentals around residential, institutional, public, commercial and industrial buildings, parks, recreational areas, and athletic fields. Not for use on golf courses and sod farms.

INGREDIENTS	By wt.
Active Ingredients:	
Clothianidin*	0.25%
Bifenthrin**	0.125%
Other Ingredients:	99.625%
Total:	100.00%

\* (E)-1-(2-chloro-1,3-thiazol-5-ylmethyl)-3-methyl-2-nitroguanidine  
\*\* 2-methylbiphenyl-3-ylmethyl (1R,3R)-3-[(Z)-2-chloro-3,3,3-trifluoroprop-1-enyl]-2,2-dimethylcyclopropanecarboxylate (cis isomers 97% minimum, trans isomers 3% maximum)

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

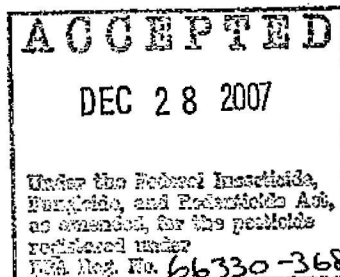
See inside booklet for additional precautionary statements

EPA Registration No. 66330-368  
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Produced for:  
Arysta LifeScience North America Corporation  
15401 Weston Parkway, Suite 150  
Cary, NC 27513

For Product Use Information, call 1-866-761-9397

Net Contents:



14

FIRST AID	
If swallowed	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If inhaled	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
If in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p><b>NOTE TO PHYSICIAN:</b> This pesticide contains a pyrethroid. If significant quantities have been swallowed, promptly eliminate the ingested quantities from the stomach and intestines. Treatment is symptomatic and supportive. Alcohol, milk, cream, and other digestible fats and oils should NOT be administered as they may increase absorption.</p>	
<p align="center"><b>HOTLINE NUMBER</b></p> <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. <b>FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL PROSAR at 1-866-303-6952.</b></p>	

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear protective eyewear. Wear: long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves (such as Natural Rubber, Selection Category A).

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some of the materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart. Applicators and other handlers (other than mixers and loaders) must wear:

- long-sleeved shirt and long pants
- shoes plus socks
- chemical-resistant gloves
- protective eyewear

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no instructions for washables are available, use detergent and hot water. Keep and wash PPE separately from other laundry.

### USER SAFETY RECOMMENDATIONS

Users should:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not apply where runoff is likely to occur. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters or rinsate.

This product is toxic to bees exposed to treatment and for more than 5 days following treatment. Do not apply this product to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period, unless the application is made in response to a public health emergency declared by appropriate state or federal authorities.

## DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Carefully read and understand the Directions for Use and restrictions before applying this product.

Do not apply this product in any way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Apply using ground equipment only; do not apply by air.

Do not apply on the following: nurseries, commercial greenhouses, grass grown for seed, golf courses and sod farms.

## GENERAL INFORMATION

**ALOFT™ LC G** is a broad spectrum, long lasting contact and systemic insecticide for control of insects infesting lawns and ornamentals in landscapes and surrounding areas. **ALOFT LC G** can be used around residences, business complexes, industrial complexes, airports, playgrounds, school yards, parks and recreation areas, athletic fields, cemeteries, arboretums, and non-production greenhouses.

## RESISTANCE MANAGEMENT

The active ingredients in **ALOFT LC G** are clothianidin, a Group 4A insecticide, and bifenthrin a Group 3 insecticide. Insect biotypes with acquired resistance to Group 4A or Group 3 insecticides may eventually dominate the insect population if Group 4A or Group 3 insecticides are used alone or repeatedly in the same site or in successive years as the primary method of control for targeted species.

To delay insecticide resistance in insects that are at risk of developing resistance to insecticides consider:

- Avoid the consecutive use of insecticides in the same group on the same insect species.
- Use tank-mixtures or pre-mixes of insecticides from a different target site of action.
- Base insecticide use on a comprehensive IPM program.
- Monitor treated insect populations for loss of field efficacy.
- Contact your State Agricultural Experiment Station, State Extension Specialists, other lawn experts and/or Arysta LifeScience North America Corporation for insecticide resistance management and/or IPM recommendations for the specific site and resistant pest problems.
- For further information or to report suspected resistance, you may contact Arysta LifeScience North America Corporation at 1-866-761-9397.

## APPLICATION EQUIPMENT

Apply **ALOFT LC G** uniformly over the area being treated with standard granular application equipment. Use either drop-type or rotary-type spreaders to apply **ALOFT LC G**.

Avoid the use of spreaders which would apply the material in narrow, concentrated bands. Calibrate application equipment prior to use according to the manufacturer's directions. Check frequently to be sure equipment is working properly and distributing granules uniformly and accurately. In order to insure continuing delivery of the correct amount of **ALOFT LC G** further adjustments to the settings should be made periodically during application.

#### **APPLICATION INSTRUCTIONS – TURFGRASS AND PERIMETERS AROUND LAWNS AND LANDSCAPED AREAS**

**ALOFT LC G** can be used for broad spectrum insect control in lawns and perimeters of lawns. **ALOFT LC G** can be used around residences, business complexes, industrial complexes, airports, playgrounds, school yards, parks and recreation areas, athletic fields, cemeteries and other similar areas.

**ALOFT LC G** has sufficient contact and residual activity to provide high levels of control. The need for an application can be based on historical monitoring of the presence of or anticipated occurrence of individual or multiple insect pest species, the site, previous records or experiences, current season adult trapping or other methods. Optimum control of white grubs will be achieved when applications are made just prior to egg laying or to early instar larvae of target pests, followed by sufficient irrigation or rainfall to move the active ingredient into the zone where the insect pests are active. Multiple applications can be made each growing season but do not use more than 160 lbs of product (0.4 lb of clothianidin active ingredient, 0.2 lb bifenthrin) per acre per year. Note: You may also use additional products containing bifenthrin as long as the maximum amount of bifenthrin does not exceed 0.4 lbs active ingredient per acre per season for use in lawns and perimeters.

**ALOFT LC G** can be applied to lawns and perimeters at 80 - 160 lbs per acre per year (1.8 - 3.6 lbs/1000 sq ft). The rate is dependent on the target pest(s), their stage of development and the desired level of control. Optimum control of white grubs (larvae) will be achieved when applications are made just prior to or just after peak egg laying. Higher rates should be used when long residual control is desired for control of multiple insect pests or late season curative (rescue) applications are made to lawns already showing grub damage or damage due to scavenging of animals. Multiple applications can be made but do not exceed the maximum amount per year (160 lbs/acre or 3.6 lbs/1,000 sq ft). Consult your local State Agricultural Experiment Station, State Extension Turf Specialists or other lawn experts for specific information concerning the timing of applications.

For early season control of insect pests (such as annual bluegrass weevil) and for control of white grubs, make the first application of **ALOFT LC G** at peak adult activity or when other insect pests reach a damaging population in the spring at a rate of 100 - 160 lbs per acre (2.3 - 3.6 lbs/1000 sq ft). For control of white grubs at standard application timing, apply 80 - 160 lbs per acre (1.8 - 3.6 lbs/1000 sq ft) just prior peak adult activity or to early instar larvae.

For control of surface insects, do not water in until at least 24 hours after application. If the target insects are in the thatch, lightly water in after application with enough water to wet the thatch zone. For control of armyworms, cutworms and other surface feeders, apply 80 - 160 lbs per acre (1.8 - 3.6 lbs/1000 sq ft) at the first sign of insects or insect damage. Repeat the application as needed to control additional flushes of insects. Up to a total of 160 lbs per acre per year (3.6 lbs/1,000 sq ft) can be applied.

For control of existing grub populations, water in after application with enough water to move the insecticide into the zone where the grubs are feeding.

Avoid mowing lawn until after irrigation or rainfall has occurred so that uniformity of application will not be affected.

<b>TURFGRASS AND PERIMETERS AROUND LAWNS</b>
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TURFGRASS AND PERIMETERS AROUND LAWNS	
APPLICATION RATE	INSECT PEST
1.8 – 3.6 lbs per 1,000 sq. ft. (80-160 lbs per acre)	Annual Bluegrass Weevil (Adults) <sup>1</sup> Annual Bluegrass Weevil (Larvae) <sup>1</sup> Ants, Nuisance (Excluding fire, harvester, pharaoh, and carpenter ants) Armyworms Billbugs <sup>2</sup> Black Turfgrass Ataenius <sup>3</sup> Chinch Bugs Cutworms European Crane Fly Grasshoppers Leafhoppers Mole Crickets <sup>4</sup> Pillbugs Sod webworms Sowbugs Spittle bug Sugarcane grub White grubs (Asiatic Garden Beetle, European Chafer, Green June Beetle, Japanese Beetle, Northern Masked Chafer, <i>Phyllophaga</i> spp. (May or June Beetle), Oriental Beetle, Southern Masked Chafer)
<p><sup>1</sup> <b>Annual Bluegrass Weevil:</b> Application can be timed for adult weevils as they move from their over-wintering sites into turf. This movement usually begins before or when Forsythia is in full bloom and continues to full bloom of dogwoods. Larvae from adult weevils that escape the application will be controlled with the application directed at adult weevils. Applications made after adult weevil activity will control larvae. Consult your State Cooperative Extension Service for more specific information regarding timing of application. White grubs will be controlled with an application targeted towards Annual Bluegrass Weevil.</p> <p><sup>2</sup> <b>Billbugs:</b> Application can be made when adult Billbugs are first observed, usually in April and May in temperate regions. A spring application will also control Billbug larvae. Consult your State Cooperative Extension Service for more specific information regarding timing of application. White grubs will be controlled with an application targeted towards Billbugs.</p> <p><sup>3</sup> <b>Black Turfgrass Ataenius:</b> Application can be timed to coincide with the first generation of Black Turfgrass Ataenius that usually appears during May. White grubs will be controlled with an application targeted towards Black Turfgrass Ataenius.</p> <p><sup>4</sup> <b>Mole Crickets:</b> Application should be made during peak adult flight and egg lay. If the soil is dry, irrigate before application to stimulate insect activity and water after application to release the insecticide from the granule carrier.</p>	
<p><b>NOTE</b></p> <ul style="list-style-type: none"> <li>Do not apply more than a total of 160 lbs of ALOFT LC G (0.4 lb of clothianidin active ingredient, 0.2 lb bifenthrin) per acre per season.</li> <li>If the maximum season limit of ALOFT LC G has been applied and pest populations require additional treatments, use another pesticide labeled for control of the targeted insects that does not contain clothianidin. You may use additional products containing bifenthrin as long as the maximum amount of bifenthrin does not exceed 0.4 lbs active ingredient per acre per season for</li> </ul>	



<b>TURFGRASS AND PERIMETERS AROUND LAWNS</b>
use in lawns and perimeters.

#### **APPLICATION INSTRUCTIONS – LANDSCAPE ORNAMENTALS**

**ALOFT LC G** is a broad spectrum, contact and long lasting systemic insect control product for a wide spectrum of insects infesting landscape ornamentals. **ALOFT LC G** can be used around residences, business complexes, industrial complexes, airports, playgrounds, school yards, parks and recreation areas, athletic fields, cemeteries, arboretums and non-production greenhouses.

For control of surface insects and insects that crawl along the surface of the soil or mulch under ornamentals, water in lightly after application to move the insecticide into the areas where insects are active. Water in with enough irrigation or rainfall to move the active ingredient into the zone where the target insects are active. Soil surface applications will provide control of foliage feeding insects; however, optimum control will not be achieved until the active ingredient is taken up by the plant roots and translocated to the area where insects are feeding.

<b>LANDSCAPE ORNAMENTALS</b>		
<b>SOIL SURFACE or MULCH APPLICATION</b>	<b>SOIL INSECT PEST</b>	<b>APPLICATION INSTRUCTIONS</b>
1.8 – 3.6 lb per 1,000 sq ft (80 – 160 lb per acre)	Ants, Nuisance (Excluding fire, harvester, pharaoh, and carpenter ants) Beet Armyworm Beetles Black Vine Weevils (Adults) Centipedes Crickets Cutworms Diaprepes (Adults) Earwigs Fall Armyworms Grasshoppers Millipedes	Pillbugs White grubs (Asiatic Garden Beetle, European Chafer, Green June Beetle, Japanese Beetle, Northern Masked Chafer, <i>Phyllophaga</i> spp. (May or June Beetle), Oriental Beetle, Southern Masked Chafer)
		Apply in enough water to wet the areas where the insects are active or water in after application with enough irrigation to move the insecticide into the areas where insects are active.

LANDSCAPE ORNAMENTALS		
SOIL SURFACE or MULCH APPLICATION	ABOVE GROUND INSECT PEST	APPLICATION INSTRUCTIONS
3 – 3.6 lb per 1,000 sq ft (132 – 160 lb per acre)	<div>Aphids</div> <div>Azalea lace bug</div> <div>Caterpillars</div> <div>Flea Beetles</div> <div>Florida wax scale</div> <div>Glassy winged sharpshooter</div> <div>Gypsy Moth</div> <div>Caterpillars</div> <div>Japanese Beetles (Adults)</div> <div>Leafhoppers</div> <div>Leafminers</div> <div>Leafrollers</div> <div>Mealybugs</div> <div>Plant Bugs (incl. <i>Lygus</i> spp)</div> <div>Root Weevils (incl. Black Vine Weevils)</div> <div>Scales, Soft</div> <div>Whiteflies</div>	Apply in enough water to wet the root zone of the plants. Control of leaf feeding insects will be delayed until the insecticide is taken up by the roots and moved into the areas where insects are feeding, usually 2-4 weeks.

**NOTE**

- Do not apply more than a total of 160 lbs of **ALOFT LC G** (0.4 lb of clothianidin active ingredient, 0.2 lb bifenthrin) per acre per season.
- If the maximum season limit of **ALOFT LC G** has been applied and pest populations require additional treatments, use another pesticide labeled for control of the targeted insects that does not contain clothianidin. You may use additional products containing bifenthrin as long as the maximum amount of bifenthrin does not exceed 0.4 lbs active ingredient per acre per season for use in lawns and perimeters.

When treating perimeters of structures, make the application to the ground from 5-10 feet adjacent to the structure.

FOR PERIMETER APPLICATIONS									
Appl. Rate: Lbs/1,000 sq ft	Band Width In Feet	Lbs of ALOFT LC G/ Linear Distance (Feet) Around Structure							
		100	150	200	250	300	400	500	1,000
1.8	5	1	1.5	2	2.5	3	4	5	10
1.8	10	2	3	4	5	6	8	10	20
2.8	5	1.4	2	2.8	3.5	4.2	5.6	7	14
2.8	10	3	4.5	6	7.5	9	12	15	30
3.6	5	2	3	4	5	6	8	10	20
3.6	10	3.6	5.4	7.2	9	10.8	14.4	18	36

**NOTE:** This table provides amounts which include the total area to be treated. This area includes the area of a circle whose radius is the bandwidth (this accounts for the area treated at the four corners of the structure) plus the linear distance treated times the bandwidth.

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#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in a cool, dry place away from excessive heat. Do not store near food, feed, fertilizers, seeds, or other pesticides. Keep this product out of reach of children and animals at all times. Store in original container only. Open the product container carefully and after use, seal tightly.

**To contain a spill:** Cover the spilled product to prevent the material from spreading. If the product container is damaged, place the entire container along with the product in a secure receptacle and clearly label the contents.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

#### CONTAINER DISPOSAL:

Paper and plastic bags: Completely empty bag into application equipment. Then dispose of in a sanitary landfill, or (if allowed by State and local authorities) by burning. If burned, stay out of smoke.

**FOR 24-HOUR CHEMICAL EMERGENCY (Spill, Leak, Fire or Accident) ASSISTANCE:** Call CHEMTREC at 1-800-424-9300.

#### Warranty and Disclaimer Statement

The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Such risks may arise from weather conditions, soil factors, off-target movement, unconventional farming techniques, the presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Arysta LifeScience North America Corporation ("Arysta"), and can cause crop injury, injury to non-target crops or plants, ineffectiveness of the product, or other unintended consequences. All such risks shall be assumed by the user or buyer.

Arysta warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions.

This warranty does not extend to the use of this product contrary to label instructions or under conditions not reasonably foreseeable to Arysta, and is subject to the inherent risks described above.

**TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARYSTA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARYSTA, MANUFACTURER, AND SELLER DISCLAIM AND SHALL NOT BE LIABLE FOR ANY SPECIAL, INCIDENTAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE, HANDLING, APPLICATION, STORAGE, OR DISPOSAL OF THIS PRODUCT OR FOR DAMAGES IN THE NATURE OF PENALTIES, AND THE USER AND BUYER WAIVE ANY RIGHT THAT THEY MAY HAVE TO SUCH DAMAGES. NO AGENT, REPRESENTATIVE OR EMPLOYEE OF ARYSTA IS AUTHORIZED TO MAKE ANY WARRANTY, GUARANTEE OR REPRESENTATION BEYOND THOSE CONTAINED HEREIN OR TO MODIFY THE WARRANTIES CONTAINED HEREIN.**

**TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE TOTAL LIABILITY OF ARYSTA, MANUFACTURER, AND SELLER, SHALL BE LIMITED TO THE PURCHASE PRICE PAID, OR AT ARYSTA'S ELECTION, THE REPLACEMENT OF THE PRODUCT.**

ALOFT™ is a trademark of Arysta LifeScience North America Corporation.

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0080. Approval expires 2-28-



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 66330-368	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ALOFT LC G Insecticide	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Arysta LifeScience North America Corporation 15401 Weston Parkway, Suite 150 Cary, NC 27513  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____  Product Name _____	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Label amendment to increase the lower application rate and changes in the text for clarifications

## Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Text No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container
		If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Doina Bujor	Title Regulatory Manager	Telephone No. (include Area Code) 919-678-4379
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Manager	
4. Typed Name Doina Bujor	5. Date December 12, 2007	



Mr. Bo Davis (703-306-0415)  
Registration Division/Insecticide Branch  
Office of Pesticide Programs (APPL)  
Document Processing Desk (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Dear Mr. Davis:

Enclosed is a label amendment submission for ALOFT LC G Insecticide (EPA Reg. No. 66330-368). The changes made to the label are mainly increasing the lower application rate to comply with the transfer agreement between Arysta LifeScience and Valent USA.

**The submission contains:**

- Application form 8570-1
- 5 Copies of the clean draft label
- 1 copy of the red-lined label
- CD containing the electronic file of the label

Please notify us as soon as the label amendment is approved. If you have any questions regarding this submission please contact me at (919) 678-4879 or by email at [doina.bujor@arystalifescience.com](mailto:doina.bujor@arystalifescience.com)

Sincerely,

Doina Bujor  
Regulatory Manager  
Arysta LifeScience North America

[illegible]



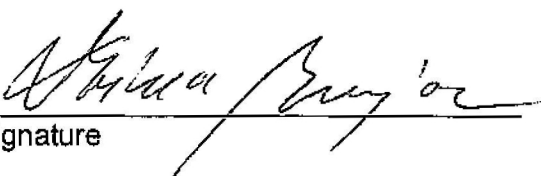
# Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
66330-368	12-12-2007	066330-00368.20071212.amendment.PDF

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

  
Signature

12/12/2007

Date

Doina Bujor  
Name (typed)

Regulatory Manager  
Title

# FAST-TRACK AMENDMENTS-Completeness Screening Checklist

Experts In-Processing Signat

*James Darlington*

IRB

EPA Reg. Number: 66330-368

EPA Receipt Date:

12/13/07

	Check List Item	Yes	No	NA
1	Application Form (EPA Form 8570-1) -signed?	✓		
2	Confidential Statement of Formula (EPA Form 8570-29) - signed?			✓
3	Certification with Respect to Citation of Data (EPA Form 8570-34) signed?			✓
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?			✓
5	Data Matrix (EPA Form 8570-35) [Applicable, for adding me-too uses]			✓
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	Is Label Included? (5 copies)	✓		
	Comments:			

*Bo*  
*in appw*

# Fee for Service

{8214859~

This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies?      ☐ Fee Waiver?

☐ volpay    % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 1

Receipt No.

S-

821485

EPA File Symbol/Reg. No.

66330-368

Pin-Punch Date:

12/13/2007

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_

Parent/Child Decisions:

NON-FEE

☒ Inert Cleared for Intended Use



Uncleared Inert in Product

Reviewer: Kathryn Montague

Date: 12/17/07

Remarks:





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

December 17, 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

DOINA BUJOR  
ARYSTA LIFESCIENCE NORTH AMERICA CORPORATION  
15401 WESTON PARKWAY, SUITE 150  
CARY, NC 27513-

PRODUCT NAME: ALOFT LC G INSECTICIDE  
COMPANY NAME: ARYSTA LIFESCIENCE NORTH AMERICA CORPORATION  
EPA FILE SYMBOL: 66330-368  
EPA RECEIPT DATE: 12/13/07

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely, *A. Wrice*  
Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division



Mr. Kable Bo Davis, Entomologist  
Insecticide-Rodenticide Branch  
**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
Office of Pesticide Programs/Registration Division (7505P)  
Document Processing Desk/APPL  
Room S-4900 One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

Dear Mr. Davis:

Enclosed please find one copy of final printed labeling and application form for Pesticide Registration (8570-1) for ALOFT LC G INSECTICIDE; EPA Reg. No. 66330-368. This labeling includes all language approved in the Agency's letter dated 10/18/2007.

If you have any questions or require additional information, please feel free to contact me.

Sincerely yours,

**Jean Butler**  
Registration Specialist  
901/432-5119

Enclosure(s)

/jb

530 Oak Court Drive #100 Memphis, TN 38117 Telephone: 901-432-5000 Fax: 901-432-5100  
www.arystalifescience.com

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Yellow - Applicant copy

# Aloft™ LC G

## Insecticide

GROUP	4A	INSECTICIDE
-------	----	-------------

GROUP	3	INSECTICIDE
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For contact and systemic insect pest control in lawns and landscape ornamentals around residential, institutional, public, commercial and industrial buildings, parks, recreational areas, and athletic fields. Not for use on golf courses and sod farms.

NOT REVIEWED  
In Accordance with PR Notice 82-2  
Based on Draft Labeling Dated

Oct 18, 2007

### INGREDIENTS:

#### Active Ingredients:

	By wt.
Clothianidin*	0.25%
Bifenthrin**	0.125%
Other Ingredients:	99.625%
Total	100.000%

\* (E)-1-(2-chloro-1,3-thiazol-5-ylmethyl)-3-methyl-2-nitroguanidine

\*\* 2-methylbiphenyl-3-ylmethyl (1RS,3RS)-3-[(Z)-2-chloro-3,3,3-trifluoroprop-1-enyl]-2,2-dimethylcyclopropanecarboxylate (cis isomers 97% minimum, trans isomers 3% maximum)

## KEEP OUT OF REACH OF CHILDREN CAUTION

See back panel for additional Precautionary Statements and Directions For Use.

For Product Use Information, call 1-866-761-9397

Produced for:

**ARYSTA LIFESCIENCE NORTH AMERICA CORPORATION**

15401 Weston Parkway, Suite 150

Cary, NC 27513

EPA Reg. No. 66330-368

EPA Est. No. 51036-GA-001

AD101807

102333

**NET CONTENTS: 40 LBS**



Arysta LifeScience™

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FIRST AID	
If swallowed	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If inhaled	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
If in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>NOTE TO PHYSICIAN:</b> This pesticide contains a pyrethroid. If significant quantities have been swallowed, promptly eliminate the ingested quantities from the stomach and intestines. Treatment is symptomatic and supportive. Alcohol, milk, cream, and other digestible fats and oils should NOT be administered as they may increase absorption.	
<b>HOTLINE NUMBER</b> Have the product container or label with you when calling a poison control center or doctor, or going for treatment. <b>FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL PROSAR at 1-866-303-6952.</b>	

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear protective eyewear. Wear long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves (such as Natural Rubber, Selection Category A).

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some of the materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical resistance category selection chart. Applicators and other handlers (other than mixers and loaders) must wear:

- long-sleeved shirt and long pants
- shoes plus socks
- chemical-resistant gloves
- protective eyewear

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no instructions for washables are available, use detergent and hot water. Keep and wash PPE separately from other laundry.

### USER SAFETY RECOMMENDATIONS

Users should:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not apply where runoff is likely to occur. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters or rinsate.

This product is toxic to bees exposed to treatment and for more than 5 days following treatment. Do not apply this product to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period, unless the application is made in response to a public health emergency declared by appropriate state or federal authorities.

### DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Carefully read and understand the Directions for Use and restrictions before applying this product.

Do not apply this product in any way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Apply using ground equipment only; do not apply by air.

Do not apply on the following: nurseries, commercial greenhouses, grass grown for seed, golf courses and sod farms.

#### GENERAL INFORMATION

**ALDOFT™ LC G** is a broad spectrum, long lasting contact and systemic insecticide for control of insects infesting lawns and ornamentals in landscapes and surrounding areas. **ALDOFT LC G** can be used around residences, business complexes, industrial complexes, airports, playgrounds, school yards, parks and recreation areas, athletic fields, cemeteries, arboretums, and non-production greenhouses.

#### RESISTANCE MANAGEMENT

The active ingredients in **ALDOFT LC G** are clothianidin, a Group 4A insecticide, and bifenthrin, a Group 3 insecticide. Insect biotypes with acquired resistance to Group 4A and Group 3 insecticides may eventually dominate the insect population if Group 4A or Group 3 insecticides are used alone or repeatedly in the same field or in successive years as the primary method of control for targeted species. Previous extensive use of Group 3 insecticides in a given area may result in resistance to selected target insects. If this is the case, the bifenthrin component of **ALDOFT LC G** may not perform as expected. This may result in partial or total loss of control of those species by **ALDOFT LC G**.

To delay insecticide resistance in insects that are at risk of developing resistance to insecticides consider:

- Avoid the consecutive use of other Group 3 or Group 4A insecticides on the same insect species.
- Use tank-mixtures or pre-mixes of insecticides from a different target site of action group as long as both products are registered for the same use.
- Base insecticide use on a comprehensive IPM program.
- Monitor treated insect populations for loss of field efficacy.
- Contact your State Agricultural Experiment Station, State Extension Specialists, or other lawn experts and/or Arysta LifeScience North America Corporation for insecticide resistance management and/or IPM recommendations for the specific site and resistant pest problems.
- For further information or to report suspected resistance, you may contact Arysta LifeScience North America Corporation at 1-866-761-9397.

#### APPLICATION EQUIPMENT

Apply ALOFT LC G uniformly over the area being treated with normally used granular application equipment. Use either drop-type or rotary-type spreaders to apply ALOFT LC G.

Avoid the use of spreaders which would apply the material in narrow, concentrated bands. Calibrate application equipment prior to use according to the manufacturer's directions. Check frequently to be sure equipment is working properly and distributing granules uniformly and accurately. In order to insure continuing delivery of the correct amount of ALOFT LC G further adjustments to the settings should be made periodically during application.

#### APPLICATION INSTRUCTIONS — TURFGRASS AND PERIMETERS AROUND LAWNS AND LANDSCAPED AREAS

ALOFT LC G can be used for broad spectrum insect control in lawns and perimeters of lawns. ALOFT LC G can be used around residences, business complexes, industrial complexes, airports, playgrounds, school yards, parks and recreation areas, athletic fields, cemeteries and other similar areas.

ALOFT LC G has sufficient contact and residual activity to provide high levels of control. The need for an application can be based on historical monitoring of the presence of or anticipated occurrence of individual or multiple insect pest species, the site, previous records or experiences, current season adult trapping or other methods. Where multiple pests are present or anticipated, use the highest rates suggested to control the species that are present. Optimum control of white grubs will be achieved when applications are made just prior to egg laying or to early instar larvae of target pests, followed by sufficient irrigation or rainfall to move the active ingredient into the zone where the insect pests are active. Up to four applications can be made each growing season but do not use more than 160 lbs of product (0.4 lb of clothianidin active ingredient, 0.2 lb bifenthrin) per acre per year. Note: You may also use additional products containing bifenthrin as long as the maximum amount of bifenthrin does not exceed 0.4 lbs active ingredient per acre per season for use in lawns and perimeters.

ALOFT LC G can be applied to lawns and perimeters at 40 - 160 lbs per acre per year (1 - 3.6 lbs/1,000 sq ft). The rate is dependent on the target pest(s), their stage of development and the desired level of control. Optimum results for grubs (larvae) will be achieved when applications are made just prior to or just after peak egg laying. Higher rates should be used when long residual control is desired or late season curative applications are made to lawns already showing grub damage. Multiple applications can be made but do not exceed the maximum amount per year (160 lbs/acre or 3.6 lbs/1,000 sq ft). Consult your local State Agricultural Experiment Station, State Extension Turf Specialists or other lawn experts for specific information concerning the timing of applications.

For control of early season insect pests and for control of white grubs, make the first application of ALOFT LC G at peak adult activity or when other insect pests reach a damaging population in the spring at a rate of 40 - 100 lbs per acre (1 - 2.3 lbs/1,000 sq ft). If a total of 100 lbs per acre has not been applied before peak egg laying period of white grub adults, make another application to bring the total up to 100 lbs/acre just prior to egg laying or to early instar larvae of white grub adults. If no applications of ALOFT LC G have been made, apply 80 lbs per acre (1.8 lbs/1,000 sq ft) just prior to egg laying or to early instar larvae of target pests for control of white grubs.

For control of surface insects, do not water in until at least 24 hours after the application. If the target insects are in the thatch, lightly water in after application with enough water to wet the thatch zone. For control of armyworms, cutworms and other surface feeders, apply 40 - 80 lbs per acre (1 - 1.8 lbs/1,000 sq ft) at the first sign of insects or insect damage. Repeat the application at monthly intervals or as needed to control additional flushes of insects. Up to a total of 160 lbs per acre per year (3.6 lbs/1,000 sq ft) can be applied.

For control of existing grub populations, water in after application with enough water to move the insecticide into the root zone where the grubs are feeding.

Avoid mowing lawn until after irrigation or rainfall has occurred so that uniformity of application will not be affected.

TURFGRASS AND PERIMETERS AROUND LAWNS	
APPLICATION RATE	INSECT PEST
1.8 - 3 lbs per 1,000 sq ft (80-132 lbs per acre)	Annual Bluegrass Weevil (Adults) <sup>1</sup> Annual Bluegrass Weevil (Larvae) <sup>1</sup> Ants, Nuisance (Excluding fire, harvester, pharaoh, and carpenter ants) Armyworms Billbugs <sup>2</sup> Black Turfgrass Ataenius <sup>3</sup> Chinch Bugs Cutworms European Crane Fly Grasshoppers Leafhoppers Mole Crickets <sup>4</sup> Pillbugs Sod webworms Sowbugs Spittle bug Sugarcane grub White grubs (Asiatic Garden Beetle, European Chafer, Green June Beetle, Japanese Beetle, Northern Masked Chater, <i>Phyllophaga</i> spp. (May or June Beetle), Oriental Beetle, Southern Masked Chafer)
<p><sup>1</sup> Annual Bluegrass Weevil: Application can be timed for adult weevils as they move from their over-wintering sites into turf. This movement usually begins when Forsythia is in full bloom and continues to full bloom of dogwoods. Larvae from adult weevils that escape the application will be controlled with the application directed at adult weevils. Applications made after adult weevil activity will control larvae. Consult your State Cooperative Extension Service for more specific information regarding timing of application. White grubs will be controlled with an application targeted towards Annual Bluegrass Weevil.</p> <p><sup>2</sup> Billbugs: Application can be made when adult Billbugs are first observed, usually in April and May in temperate regions. A spring application will also control Billbug larvae. Consult your State Cooperative Extension Service for more specific information regarding timing of application. White grubs will be controlled with an application targeted towards Billbugs.</p> <p><sup>3</sup> Black Turfgrass Ataenius: Application can be timed to coincide with the first generation of Black Turfgrass Ataenius that usually appears during May. White grubs will be controlled with an application targeted towards Black Turfgrass Ataenius.</p> <p><sup>4</sup> Mole Crickets: Application should be made during peak adult flight and egg lay. If the soil is dry, irrigate before application to stimulate insect activity and water after application to release the insecticide from the granule carrier.</p>	
<p><b>NOTE</b></p> <ul style="list-style-type: none"><li>• In New York State, this product may not be applied to any grass or turf area within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch).</li><li>• In New York State, make a single repeat application of ALOFT LC G if there are signs of renewed insect activity, but not sooner than two weeks after the first application.</li><li>• Do not apply more than a total of 160 lbs of ALOFT LC G (0.4 lb of clothianidin active ingredient, 0.2 lb bifenthrin) per acre per season.</li><li>• If the maximum season limit of ALOFT LC G has been applied and pest populations require additional treatments, use another registered pesticide labeled for control of the targeted insects. You may also use additional products containing bifenthrin as long as the maximum amount of bifenthrin does not exceed 0.4 lbs active ingredient per acre per season for use in lawns and perimeters.</li></ul>	

# APPLICATION INSTRUCTIONS - LANDSCAPE ORNAMENTALS

**ALOFT LC G** is a broad spectrum, contact and long lasting systemic insect control product for a wide spectrum of insects infesting landscape ornamentals. **ALOFT LC G** can be used around residences, business complexes, industrial complexes, airports, playgrounds, school yards, parks and recreation areas, athletic fields, cemeteries, arboreta and non-production greenhouses.

For control of surface insects and insects that crawl along the surface of the soil or mulch under ornamentals, water in lightly after application to move the insecticide into the areas where insects are active. Water in with enough irrigation or rainfall to move the active ingredient into the zone where the target insects are active. Soil surface applications will provide control of foliage feeding insects; however, optimum control will not be achieved until the active ingredient is taken up by the plant roots and translocated to the area where insects are feeding.

LANDSCAPE ORNAMENTALS		
SOIL SURFACE or MULCH APPLICATION	SOIL INSECT PEST	APPLICATION INSTRUCTIONS
1.8 - 3 lb per 1,000 sq ft (80 - 132 lb per acre)	<div> Ants, Nuisance (Excluding fire, harvester, pharaoh, and carpenter ants)  Beet Armyworm  Beetles  Black Vine Weevils (Adults)  Centipedes  Crickets  Cutworms  Diaprepes (Adults) </div> <div> Earwigs  Fall Armyworms  Grasshoppers  Millipedes  Pillbugs  White grubs (Asiatic Garden Beetle, European Chafer, Green June Beetle, Japanese Beetle, Northern Masked Chater, <i>Phyllophaga</i> spp. (May or June Beetle), Oriental Beetle, Southern Masked Chater) </div>	Apply in enough water to wet the areas where the insects are active or water in after application with enough irrigation to move the insecticide into the areas where insects are active.
SOIL SURFACE or MULCH APPLICATION	FOLIAR INSECT PEST	APPLICATION INSTRUCTIONS
3 - 3.6 lb per 1,000 sq ft (132 - 160 lb per acre)	<div> Aphids  Azalea lace bug  Caterpillars  Flea Beetles  Florida wax scale  Glassy winged sharpshooter  Gypsy Moth Caterpillars  Japanese Beetles (Adults) </div> <div> Leafhoppers  Leafminers  Leafrollers  Mealybugs  Plant Bugs (incl. <i>Lygus</i> spp)  Root Weevils (incl. Black Vine Weevils)  Scales, Soft  Whiteflies </div>	Apply in enough water to wet the root zone of the plants. Control of leaf feeding insects will be delayed until the insecticide is taken up by the roots and moved into the areas where insects are feeding, usually 2-4 weeks.
<b>NOTE</b> <ul style="list-style-type: none"> <li>Do not apply more than a total of 160 lbs of <b>ALOFT LC G</b> (0.4 lb of clothianidin active ingredient, 0.2 lb bifenthrin) per acre per season.</li> <li>If the maximum season limit of <b>ALOFT LC G</b> has been applied and pest populations require additional treatments, use another registered pesticide labeled for control of the targeted insects. You may also use additional products containing bifenthrin as long as the maximum amount of bifenthrin does not exceed 0.4 lbs active ingredient per acre per season for use in lawns and perimeters.</li> </ul>		

When treating perimeters of structures, make the application to the ground from 5-10 feet adjacent to the structure.

FOR PERIMETER APPLICATIONS									
Appl. Rate: Lbs/1,000 sq ft	Band Width in Feet	Lbs of ALOFT LC G/ Linear Distance (Feet) Around Structure							
		100	150	200	250	300	400	500	1,000
1.8	5	1	1.5	2	2.5	3	4	5	10
1.8	10	2	3	4	5	6	8	10	20
2.8	5	1.4	2	2.8	3.5	4.2	5.6	7	14
2.8	10	3	4.5	6	7.5	9	12	15	30
3.6	5	2	3	4	5	6	8	10	20
3.6	10	3.6	5.4	7.2	9	10.8	14.4	18.0	36
<b>NOTE:</b> This table provides amounts which include the total area to be treated. This area includes the area of a circle whose radius is the bandwidth (this accounts for the area treated at the four corners of the structure) plus the linear distance treated times the bandwidth.									

STORAGE AND DISPOSAL	
Do not contaminate water, food or feed by storage or disposal.	
<b>PESTICIDE STORAGE:</b> Store in a cool, dry place away from excessive heat. Do not store near food, feed, fertilizers, seeds, or other pesticides. Keep this product out of reach of children and animals at all times. Store in original container only. Open the product container carefully and after use, seal tightly.	
<b>To contain a spill:</b> Cover the spilled product to prevent the material from spreading. If the product container is damaged, place the entire container along with the product in a secure receptacle and clearly label the contents.	
<b>PESTICIDE DISPOSAL:</b> Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.	
<b>CONTAINER DISPOSAL:</b> Paper and plastic bags: Completely empty bag into application equipment. Then dispose of in a sanitary landfill, or (if allowed by State and local authorities) by burning. If burned, stay out of smoke.	
<b>FOR 24-HOUR CHEMICAL EMERGENCY (Spill, Leak, Fire or Accident) ASSISTANCE:</b> Call CHEMTREC at 1-800-424-9300.	

### Warranty and Disclaimer Statement

The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Such risks may arise from weather conditions, soil factors, off-target movement, unconventional farming techniques, the presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Arysta LifeScience North America Corporation ("Arysta"), and can cause crop injury, injury to non-target crops or plants, ineffectiveness of the product, or other unintended consequences. All such risks shall be assumed by the user or buyer.

Arysta warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. This warranty does not extend to the use of this product contrary to label instructions or under conditions not reasonably foreseeable to Arysta, and is subject to the inherent risks described above.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARYSTA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARYSTA, MANUFACTURER, AND SELLER DISCLAIM AND SHALL NOT BE LIABLE FOR ANY SPECIAL, INCIDENTAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE, HANDLING, APPLICATION, STORAGE, OR DISPOSAL OF THIS PRODUCT OR FOR DAMAGES IN THE NATURE OF PENALTIES, AND THE USER AND BUYER WAIVE ANY RIGHT THAT THEY MAY HAVE TO SUCH DAMAGES. NO AGENT, REPRESENTATIVE OR EMPLOYEE OF ARYSTA IS AUTHORIZED TO MAKE ANY WARRANTY, GUARANTEE OR REPRESENTATION BEYOND THOSE CONTAINED HEREIN OR TO MODIFY THE WARRANTIES CONTAINED HEREIN. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE TOTAL LIABILITY OF ARYSTA, MANUFACTURER, AND SELLER, SHALL BE LIMITED TO THE PURCHASE PRICE PAID, OR AT ARYSTA'S ELECTION, THE REPLACEMENT OF THE PRODUCT.

ALOFIT™ is a trademark of Arysta LifeScience North America Corporation.

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## U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs  
Registration Division (7505C)  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

EPA Reg. Number:

66330-368

Date of Issuance:

OCT 18 2007

## NOTICE OF PESTICIDE:

☒ Registration☐ Reregistration

(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

Aloft LC G Insecticide

Name and Address of Registrant (include ZIP Code):

Arysta LifeScience North America Corporation  
15401 Weston Parkway, Suite 150  
Cary, NC 27513

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit such data.
2. Make the following label changes before you release the product for shipment:
  - a. Revise the EPA Registration Number to read, "EPA Reg. No. 66330-368".
  - b. Revise the **Hazards to Humans and Domestic Animals** statement to read "*Caution: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear protective eyewear. Wear: long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves (such as Natural Rubber, Selection Category A).*"

Signature of Approving Official:

Kable Bo Davis, Entomologist  
Insecticide-Rodenticide Branch, Registration Division (7505P)

Date:

OCT 18 2007

- c. Within the **Personal Protective Equipment (PPE)** section of the label, include:  
    *"Protective Eyewear"*
- d. Within the **User Safety Recommendations** section of the label, revise the sentence  
    *"Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet."* to  
    read *"Wash thoroughly with soap and water after handling and before eating, drinking,  
    chewing gum, or using tobacco."*
3. The data requirements for storage stability (830-6317) and corrosion characteristics  
    (830- 6320) have not been satisfied, and must be submitted within eighteen months of the  
    date of this letter.
4. Submit one copy of the revised final printed label for the record before you release the  
    product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in  
accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of  
these conditions.

A stamped copy of the label is enclosed for your records.

Kable Bo Davis  
Entomologist  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

Enclosure

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**ALOFT™ LC G**  
**INSECTICIDE**

GROUP	4A	INSECTICIDE
GROUP	3	INSECTICIDE

For contact and systemic insect pest control in lawns and landscape ornamentals around residential, institutional, public, commercial and industrial buildings, parks, recreational areas, and athletic fields. Not for use on golf courses and sod farms.

INGREDIENTS	By wt.
Active Ingredients:	
Clothianidin*	0.25%
Bifenthrin**	0.125%
Other Ingredients	99.625%
Total	100.00%

\*(E)-1-(2-chloro-1,3-thiazol-5-ylmethyl)-3-methyl-2-nitroguanidine.

\*\* 2-methylbiphenyl-3-ylmethyl (1RS,3RS)-3-[(Z)-2-chloro-3,3,3-trifluoroprop-1-enyl]-2,2-dimethylcyclopropanecarboxylate (cis isomers 97% minimum, trans isomers 3% maximum)

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See inside booklet for additional precautionary statements.

EPA Registration No. 66330-\_\_\_\_  
EPA Est. No. \_\_\_\_\_

Produced for:  
Arysta LifeScience North America Corporation  
15401 Weston Parkway, Suite 150  
Cary, NC 27513

For Product Use Information, call 1-866-761-9397

Net Contents:

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated:**  
**OCT 18 2007**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
66330-368

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FIRST AID	
If swallowed	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If inhaled	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
If in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p><b>NOTE TO PHYSICIAN:</b> This pesticide contains a pyrethroid. If significant quantities have been swallowed, promptly eliminate the ingested quantities from the stomach and intestines. Treatment is symptomatic and supportive. Alcohol, milk, cream, and other digestible fats and oils should NOT be administered as they may increase absorption.</p>	
<p><b>HOTLINE NUMBER</b></p> <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. <b>FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE: CALL PROSAR at 1-866-303-6952.</b></p>	

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION.** Harmful if swallowed, absorbed through skin or inhaled. Avoid contact with eyes, skin or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some of the materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart. Applicators and other handlers (other than mixers and loaders) must wear:

- long-sleeved shirt and long pants
- shoes plus socks
- chemical-resistant gloves

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no instructions for washables are available, use detergent and hot water. Keep and wash PPE separately from other laundry.

### USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not apply where runoff is likely to occur. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters or rinsate.

This product is toxic to bees exposed to treatment and for more than 5 days following treatment. Do not apply this product to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period, unless the application is made in response to a public health emergency declared by appropriate state or federal authorities.

## DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Carefully read and understand the Directions for Use and restrictions before applying this product.

Do not apply this product in any way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Apply using ground equipment only; do not apply by air.

Do not apply on the following: nurseries, commercial greenhouses, grass grown for seed, golf courses and sod farms.

## GENERAL INFORMATION

**ALOFT™ LC G** is a broad spectrum, long lasting contact and systemic insecticide for control of insects infesting lawns and ornamentals in landscapes and surrounding areas. **ALOFT LC G** can be used around residences, business complexes, industrial complexes, airports, playgrounds, school yards, parks and recreation areas, athletic fields, cemeteries, arboretums, and non-production greenhouses.

## RESISTANCE MANAGEMENT

The active ingredients in **ALOFT LC G** are clothianidin, a Group 4A insecticide, and bifenthrin a Group 3 insecticide. Insect biotypes with acquired resistance to Group 4A and Group 3 insecticides may eventually dominate the insect population if Group 4A or Group 3 insecticides are used alone or repeatedly in the same field or in successive years as the primary method of control for targeted species. Previous extensive use of Group 3 insecticides in a given area may result in resistance to selected target insects. If this is the case, the bifenthrin component of **ALOFT LC G** may not perform as expected. This may result in partial or total loss of control of those species by **ALOFT LC G**.

To delay insecticide resistance in insects that are at risk of developing resistance to insecticides consider:

- Avoid the consecutive use of other Group 3 or Group 4A insecticides on the same insect species.
- Use tank-mixtures or pre-mixes of insecticides from a different target site of action group as long as both products are registered for the same use.
- Base insecticide use on a comprehensive IPM program.
- Monitor treated insect populations for loss of field efficacy.
- Contact your State Agricultural Experiment Station, State Extension Specialists, or other lawn experts and/or Arysta LifeScience North America Corporation for insecticide resistance management and/or IPM recommendations for the specific site and resistant pest problems.
- For further information or to report suspected resistance, you may contact Arysta LifeScience North America Corporation at 1-866-761-9397.

#### APPLICATION EQUIPMENT

Apply **ALOFT LC G** uniformly over the area being treated with normally used granular application equipment. Use either drop-type or rotary-type spreaders to apply **ALOFT LC G**.

Avoid the use of spreaders which would apply the material in narrow, concentrated bands. Calibrate application equipment prior to use according to the manufacturer's directions. Check frequently to be sure equipment is working properly and distributing granules uniformly and accurately. In order to insure continuing delivery of the correct amount of **ALOFT LC G** further adjustments to the settings should be made periodically during application.

#### APPLICATION INSTRUCTIONS – TURFGRASS AND PERIMETERS AROUND LAWNS AND LANDSCAPED AREAS

**ALOFT LC G** can be used for broad spectrum insect control in lawns and perimeters of lawns. **ALOFT LC G** can be used around residences, business complexes, industrial complexes, airports, playgrounds, school yards, parks and recreation areas, athletic fields, cemeteries and other similar areas.

**ALOFT LC G** has sufficient contact and residual activity to provide high levels of control. The need for an application can be based on historical monitoring of the presence of or anticipated occurrence of individual or multiple insect pest species, the site, previous records or experiences, current season adult trapping or other methods. Where multiple pests are present or anticipated, use the highest rates suggested to control the species that are present. Optimum control of white grubs will be achieved when applications are made just prior to egg laying or to early instar larvae of target pests, followed by sufficient irrigation or rainfall to move the active ingredient into the zone where the insect pests are active. Up to four applications can be made each growing season but do not use more than 160 lbs of product (0.4 lb of clothianidin active ingredient, 0.2 lb bifenthrin) per acre per year. Note: You may also use additional products containing bifenthrin as long as the maximum amount of bifenthrin does not exceed 0.4 lbs active ingredient per acre per season for use in lawns and perimeters.

**ALOFT LC G** can be applied to lawns and perimeters at 40 - 160 lbs per acre per year (1.0 - 3.6 lbs/1000 sq ft). The rate is dependent on the target pest(s), their stage of development and the desired level of control. Optimum results for grubs (larvae) will be achieved when applications are made just prior to or just after peak egg laying. Higher rates should be used when long residual control is desired or late season curative applications are made to lawns already showing grub damage. Multiple applications can be made but do not exceed the maximum amount per year (160 lbs/acre or 3.6 lbs/1,000 sq ft). Consult your local State Agricultural Experiment Station, State Extension Turf Specialists or other lawn experts for specific information concerning the timing of applications.

For control of early season insect pests and for control of white grubs, make the first application of **ALOFT LC G** at peak adult activity or when other insect pests reach a damaging population in the spring at a rate of 40 - 100 lbs per acre (1.0 - 2.3 lbs/1000 sq ft). If a total of 100 lbs per acre has not been applied before peak egg laying period of white grub adults, make another application to bring the total up to 100 lbs/acre just prior to egg laying or to early instar larvae of white grub adults. If no applications of **ALOFT LC G** have been made, apply 80 lbs per acre (1.8 lbs/1000 sq ft) just prior to egg laying or to early instar larvae of target pests for control of white grubs.

For control of surface insects, do not water in until at least 24 hours after the application. If the target insects are in the thatch, lightly water in after application with enough water to wet the thatch zone. For control of armyworms, cutworms and other surface feeders, apply 40 - 80 lbs per acre (1.0 - 1.8 lbs/1000 sq ft) at the first sign of insects or insect damage. Repeat the application at monthly intervals or as needed to control additional flushes of insects. Up to a total of 160 lbs per acre per year (3.6 lbs/1,000 sq ft) can be applied.

For control of existing grub populations, water in after application with enough water to move the insecticide into the root zone where the grubs are feeding.

Avoid mowing lawn until after irrigation or rainfall has occurred so that uniformity of application will not be affected.

TURFGRASS AND PERIMETERS AROUND LAWNS	
APPLICATION RATE	INSECT PEST
1.8 – 3.0 lbs per 1,000 sq. ft. (80-132 lbs per acre)	Annual Bluegrass Weevil (Adults) <sup>1</sup> Annual Bluegrass Weevil (Larvae) <sup>1</sup> Ants, Nuisance (Excluding fire, harvester, pharaoh, and carpenter ants) Armyworms Billbugs <sup>2</sup> Black Turfgrass Ataenius <sup>3</sup> Chinch Bugs Cutworms European Crane Fly Grasshoppers Leafhoppers Mole Crickets <sup>4</sup> Pillbugs Sod webworms Sowbugs Spittle bug Sugarcane grub White grubs (Asiatic Garden Beetle, European Chafer, Green June Beetle, Japanese Beetle, Northern Masked Chafer, <i>Phyllophaga</i> spp. (May or June Beetle), Oriental Beetle, Southern Masked Chafer)
<p><sup>1</sup> <b>Annual Bluegrass Weevil:</b> Application can be timed for adult weevils as they move from their over-wintering sites into turf. This movement usually begins when Forsythia is in full bloom and continues to full bloom of dogwoods. Larvae from adult weevils that escape the application will be controlled with the application directed at adult weevils. Applications made after adult weevil activity will control larvae. Consult your State Cooperative Extension Service for more specific information regarding timing of application. White grubs will be controlled with an application targeted towards Annual Bluegrass Weevil.</p> <p><sup>2</sup> <b>Billbugs:</b> Application can be made when adult Billbugs are first observed, usually in April and May in temperate regions. A spring application will also control Billbug larvae. Consult your State Cooperative Extension Service for more specific information regarding timing of application. White grubs will be controlled with an application targeted towards Billbugs.</p> <p><sup>3</sup> <b>Black Turfgrass Ataenius:</b> Application can be timed to coincide with the first generation of Black Turfgrass Ataenius that usually appears during May. White grubs will be controlled with an application targeted towards Black Turfgrass Ataenius.</p> <p><sup>4</sup> <b>Mole Crickets:</b> Application should be made during peak adult flight and egg lay. If the soil is dry, irrigate before application to stimulate insect activity and water after application to release the insecticide from the granule carrier.</p>	
<p><b>NOTE</b></p> <ul style="list-style-type: none"> <li>In New York State, this product may not be applied to any grass or turf area within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch).</li> </ul>	

### TURFGRASS AND PERIMETERS AROUND LAWNS

- In New York State, make a single repeat application of **ALOFT GC G** if there are signs of renewed insect activity, but not sooner than two weeks after the first application.
- Do not apply more than a total of 160 lbs of **ALOFT GC G** (0.4 lb of clothianidin active ingredient, 0.2 lb bifenthrin) per acre per season.
- If the maximum season limit of **ALOFT GC G** has been applied and pest populations require additional treatments, use another registered pesticide labeled for control of the targeted insects. You may also use additional products containing bifenthrin as long as the maximum amount of bifenthrin does not exceed 0.4 lbs active ingredient per-acre per season for use in lawns and perimeters.

### APPLICATION INSTRUCTIONS – LANDSCAPE ORNAMENTALS

**ALOFT LC G** is a broad spectrum, contact and long lasting systemic insect control product for a wide spectrum of insects infesting landscape ornamentals. **ALOFT LC G** can be used around residences, business complexes, industrial complexes, airports, playgrounds, school yards, parks and recreation areas, athletic fields, cemeteries, arboretums and non-production greenhouses.

For control of surface insects and insects that crawl along the surface of the soil or mulch under ornamentals, water in lightly after application to move the insecticide into the areas where insects are active. Water in with enough irrigation or rainfall to move the active ingredient into the zone where the target insects are active. Soil surface applications will provide control of foliage feeding insects; however, optimum control will not be achieved until the active ingredient is taken up by the plant roots and translocated to the area where insects are feeding.

LANDSCAPE ORNAMENTALS		
SOIL SURFACE or MULCH APPLICATION	SOIL INSECT PEST	APPLICATION INSTRUCTIONS
1.8 – 3.0 lb per 1,000 sq ft (80 – 132 lb per acre)	<div> Ants, Nuisance (Excluding fire, harvester, pharaoh, and carpenter ants)  Beet Armyworm  Beetles  Black Vine Weevils (Adults)  Centipedes  Crickets  Cutworms  Diaprepes (Adults)  Earwigs  Fall Armyworms  Grasshoppers  Millipedes </div> <div> Pillbugs  White grubs (Asiatic Garden Beetle, European Chafer, Green June Beetle, Japanese Beetle, Northern Masked Chafer, <i>Phyllophaga</i> spp. (May or June Beetle), Oriental Beetle, Southern Masked Chafer) </div>	Apply in enough water to wet the areas where the insects are active or water in after application with enough irrigation to move the insecticide into the areas where insects are active.

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LANDSCAPE ORNAMENTALS		
SOIL SURFACE or MULCH APPLICATION	FOLIAR INSECT PEST	APPLICATION INSTRUCTIONS
3.0 – 3.6 lb per 1,000 sq ft (132 – 160 lb per acre)	<div>Aphids</div> <div>Azalea lace bug</div> <div>Caterpillars</div> <div>Flea Beetles</div> <div>Florida wax scale</div> <div>Glassy winged sharpshooter</div> <div>Gypsy Moth Caterpillars</div> <div>Japanese Beetles (Adults)</div> <div>Leafhoppers</div> <div>Leafminers</div> <div>Leafrollers</div> <div>Mealybugs</div> <div>Plant Bugs (incl. <i>Lygus</i> spp)</div> <div>Root Weevils (incl. Black Vine Weevils)</div> <div>Scales, Soft</div> <div>Whiteflies</div>	Apply in enough water to wet the root zone of the plants. Control of leaf feeding insects will be delayed until the insecticide is taken up by the roots and moved into the areas where insects are feeding, usually 2-4 weeks.

**NOTE**

- Do not apply more than a total of 160 lbs of **ALOFT GC G** (0.4 lb of clothianidin active ingredient, 0.2 lb bifenthrin) per acre per season.
- If the maximum season limit of **ALOFT GC G** has been applied and pest populations require additional treatments, use another registered pesticide labeled for control of the targeted insects. You may also use additional products containing bifenthrin as long as the maximum amount of bifenthrin does not exceed 0.4 lbs active ingredient per acre per season for use in lawns and perimeters.

When treating perimeters of structures, make the application to the ground from 5-10 feet adjacent to the structure.

FOR PERIMETER APPLICATIONS									
Appl. Rate: Lbs/1,000 sq ft	Band Width In Feet	Lbs. of ALOFT GC G/ Linear Distance (Feet) Around Structure							
		100	150	200	250	300	400	500	1,000
1.8	5	1.0	1.5	2.0	2.5	3.0	4.0	5.0	10.0
1.8	10	2.0	3.0	4.0	5.0	6.0	8.0	10.0	20.0
2.8	5	1.4	2.0	2.8	3.5	4.2	5.6	7.0	14.0
2.8	10	3.0	4.5	6.0	7.5	9.0	12.0	15.0	30.0
3.6	5	2.0	3.0	4.0	5.0	6.0	8.0	10.0	20.0
3.6	10	3.6	5.4	7.2	9.0	10.8	14.4	18.0	36.0

**NOTE:** This table provides amounts which include the total area to be treated. This area includes the area of a circle whose radius is the bandwidth (this accounts for the area treated at the four corners of the structure) plus the linear distance treated times the bandwidth.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in a cool, dry place away from excessive heat. Do not store near food, feed, fertilizers, seeds, or other pesticides. Keep this product out of reach of children and animals at all times. Store in original container only. Open the product container carefully and after use, seal tightly.

**To contain a spill:** Cover the spilled product to prevent the material from spreading. If the product container is damaged, place the entire container along with the product in a secure receptacle and clearly label the contents.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

#### CONTAINER DISPOSAL:

Paper and plastic bags: Completely empty bag into application equipment. Then dispose of in a sanitary landfill, or (if allowed by State and local authorities) by burning. If burned, stay out of smoke.

**FOR 24-HOUR CHEMICAL EMERGENCY (Spill, Leak, Fire or Accident) ASSISTANCE:** Call CHEMTREC at 1-800-424-9300.

#### Warranty and Disclaimer Statement

1. The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Such risks may arise from weather conditions, soil factors, off-target movement, unconventional farming techniques, the presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Arysta LifeScience North America Corporation ("Arysta"), and can cause crop injury, injury to non-target crops or plants, ineffectiveness of the product, or other unintended consequences. All such risks shall be assumed by the user or buyer.
2. Arysta warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions.
3. This warranty does not extend to the use of this product contrary to label instructions or under conditions not reasonably foreseeable to Arysta, and is subject to the inherent risks described above. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARYSTA DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ARYSTA, MANUFACTURER, AND SELLER DISCLAIM AND SHALL NOT BE LIABLE FOR ANY SPECIAL, INCIDENTAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE, HANDLING, APPLICATION, STORAGE, OR DISPOSAL OF THIS PRODUCT OR FOR DAMAGES IN THE NATURE OF PENALTIES, AND THE USER AND BUYER WAIVE ANY RIGHT THAT THEY MAY HAVE TO SUCH DAMAGES. NO AGENT, REPRESENTATIVE OR EMPLOYEE OF ARYSTA IS AUTHORIZED TO MAKE ANY WARRANTY, GUARANTEE OR REPRESENTATION BEYOND THOSE CONTAINED HEREIN OR TO MODIFY THE WARRANTIES CONTAINED HEREIN.**
4. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE TOTAL LIABILITY OF ARYSTA, MANUFACTURER, AND SELLER, SHALL BE LIMITED TO THE PURCHASE PRICE PAID, OR AT ARYSTA'S ELECTION, THE REPLACEMENT OF THE PRODUCT.**

ALOFT is a trademark of Arysta LifeScience North America Corporation.

44



"Bujor, Doina"  
<Doina.Bujor@arystalifescien  
ce.com>

10/17/2007 03:09 PM

To Kable Davis/DC/USEPA/US@EPA

cc

bcc

Subject RE: Tox Review 2

And here is the second set

Doina Bujor  
Regulatory Manager  
Arysta LifeScience North America  
Office: 919-678-4879  
Cell: 919-802-1702  
Fax: 919-678-2194  
doina.bujor@arystalifescience.com

-----Original Message-----

From: Davis.Kable@epamail.epa.gov [mailto:Davis.Kable@epamail.epa.gov]  
Sent: Wednesday, October 17, 2007 2:22 PM  
To: Bujor, Doina  
Subject: Tox Review 2

Please find attached the toxicity review for 66330-GAI and 66330-GAT.  
Please make necessary changes to the label and email to me.

Thanks....  
Bo

Kable Bo Davis, MS  
Entomologist  
U.S. Environmental Protection Agency  
Insecticide-Rodenticide Branch  
Registration Division (7505P)  
1200 Pennsylvania Ave. NW  
Washington, DC 20460

Tel: 703 306-0415  
Fax: 703 305-6596  
Email: davis.kable@epa.gov

----- Forwarded by Kable Davis/DC/USEPA/US on 10/17/2007 02:21 PM -----

134.67.221.153  
@mintra01.rtp.ep  
a.gov

10/17/2007 02:15  
PM

Kable Davis/DC/USEPA/US@EPA

To

cc

Subject

Scan From MFP

DOT NOT REPLY TO THIS MESSAGE

(See attached file: scan.pdf)



ALOFT LC SC Master OB101707.pdf ALOFT GC SC Master OB101707.pdf



Arysta LifeScience

GAI

July 11, 2007

Ms. Venus Eagle  
Product Manager, Team 1  
Insecticide Branch  
Office of Pesticide Programs (7505P)  
Document Processing Desk (AMEND)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501  
Phone: 703-308-9354

**Re: Registration of New Products (ALOFT GC SC Insecticide, EPA Reg. No 66330-xx; ALOFT LC SC Insecticide, EPA Reg. No 66330-yy; ALOFT GC G Insecticide, EPA Reg. No 66330-zz, and ALOFT LC G Insecticide, EPA Reg. No 66330-ww)**

Dear Ms. Eagle:

It was brought to my attention by Ms. Indira Gairola that the CSFs for the new products ALOFT GC SC Insecticide, ALOFT LC SC Insecticide, ALOFT GC G Insecticide and ALOFT LC G Insecticide contain errors. I corrected the CSFs and I am re-submitting them for your review.

The present submission contains:

- Application form for each of the four (4) products
- Confidential Statement of Formula for each of the four (4) products

If you have any questions or need more information please contact me at (919) 678-4879 or by e-mail at [doina.bujor@arystalifescience.com](mailto:doina.bujor@arystalifescience.com).

Sincerely,

Doina Bujor  
Regulatory Manager

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 66330- <u>GAI</u>	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ALOFT LC G Insecticide	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Arysta LifeScience North America Corporation 15401 Weston Parkway, Suite 150 Cary, NC 27513  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____  Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

CSF correction

## Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Text No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Doina Bujor	Title Regulatory Manager	Telephone No. (Include Area Code) 919-678-4879
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)          48
2. Signature 	3. Title Regulatory Manager	
4. Typed Name Doina Bujor	5. Date July 11, 2007	



United States  
Environmental Protection Agency  
Washington, DC 20460

☒ Registration  
☐ Amendment  
☐ Other

OPP Identifier Number

917

## Application for Pesticide - Section I

1. Company/Product Number 66330- <u>GAI</u>	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ALOFT LC G Insecticide	PM# I	
5. Name and Address of Applicant (Include ZIP Code) Arysta LifeScience North America Corporation 15401 Weston Parkway, Suite 150 Cary, NC 27513  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Text No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted				Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Doina Bujor		Title Regulatory Manager		Telephone No. (Include Area Code) 919-678-4879	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Manager			
4. Typed Name Doina Bujor		5. Date March 29, 2007			



Arysta LifeScience

March 30, 2006

Ms. Venus Eagle  
Product Manager, Team 1  
Insecticide Branch  
Office of Pesticide Programs (7505P)  
Document Processing Desk (AMEND)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501  
Phone: 703-308-9354

Re: Registration of New Products (ALOFT GC SC Insecticide, EPA Reg. No 66330-xx; ALOFT LC SC Insecticide, EPA Reg. No 66330-yy; ALOFT GC G Insecticide, EPA Reg. No 66330-zz, and ALOFT LC G Insecticide, EPA Reg. No 66330-ww)

Dear Ms. Eagle:

Arysta LifeScience North America Corporation (Arysta) (EPA Company Number 66330) is submitting the present petition for registration of two (2) new formulations containing the active ingredients Clothianidin and Bifenthrin.

The new products names are ALOFT GC G Insecticide and ALOFT LC G Insecticide (formulation code name ARY044416 G) containing 0.25% clothianidin and 0.125% bifenthrin and ALOFT GC SC Insecticide and ALOFT LC SC Insecticide (formulation code name ARY044415 SC) containing 24.16% clothianidin and 12.03% bifenthrin. Arysta is pleased to submit the following in support of this registration request:

1. Administrative Documents

- Application form for each of the four (4) products
- Confidential Statement of Formula for each of the four (4) products
- Certification with Respect to Citation of Data
- Data transmittal document listing studies being submitted
- Formulator's exemption Statement for each of the four (4) products
- Data Matrix for each of the four (4) products
- 5 copies of ALOFT™ GC SC Insecticide
- 5 copies of ALOFT™ LC SC Insecticide
- 5 copies of ALOFT™ GC G Insecticide

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- 5 copies of ALOFT™ LC G Insecticide

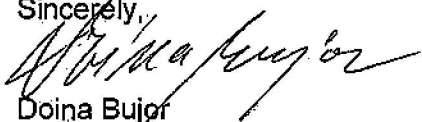
2. Supporting Data:

- Three copies of each study report as listed in the Data Transmittal Document.

Arysta believes that this action qualifies as PRIA Cat. R31 – New Product Non-fast Track.

Please notify Arysta of the receipt of these documents and the MRID number assigned to them. We would greatly appreciate receiving the Agency reviewer's comments as soon as they become available. If you have any questions or need more information please contact me at (919) 678-4879 or by e-mail at [doina.bujor@arystalifescience.com](mailto:doina.bujor@arystalifescience.com).

Sincerely,



Doina Bujor  
Regulatory Manager  
Regulatory Affairs  
Arysta LifeScience North America Corporation

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**DATA TRANSMITTAL DOCUMENT**

**Data Owner:** Arysta LifeScience North America Corporation

**Data Submitter:** Arysta LifeScience North America Corporation  
15401 Weston Parkway, Suite 150  
Cary, NC 27513

**Regulatory Action:** New Products Registration for  
ARY044415 SC (alternate names ALOFT GC SC Insecticide and  
ALOFT LC SC Insecticide)

and

ARY044416 G (alternate names ALOFT GC G Insecticide and  
ALOFT LC G Insecticide)

**Transmittal Date:** March 30, 2007

**LIST OF STUDIES**

MRID	VOLUME	GUIDELINE	STUDY
	1	OPPTS 830.1550, 1600, 1650, 1670, 1700, 1750, 1800, 1900, 6303, 6314, 6316, 6317, 6320, 7000, 7300	U.S. EPA Product Properties Test Guidelines-Group A and B of ARY044415 SC (ALOFT GC SC Insecticide and ALOFT LC SC Insecticide), Doina Bujor, February 12, 2007
	2	OPPTS 830.6302, 6303, 6304, 7300, 7000, 7100, 6314, 6315	Physical Properties of ARY044415 SC, Ashley R. Brown, January 31, 2007
	3	OPPTS 830.1550, 1600, 1650, 1670, 1700, 1750, 1800, 1900, 6303, 6314, 6316, 6317, 6320, 7000, 7300	U.S. EPA Product Properties Test Guidelines-Group A and B of ARY044415 G (ALOFT GC G and ALOFT LC G Insecticide), Doina Bujor, February 14, 2007
	4	OPPTS 830.6302, 6303, 6304, 7300, 7000, 6314,	Physical Properties of ARY044415 SC, Ashley R. Brown, January 31, 2007
	5	OPPTS 870.1100	ARY044415 SC - Acute Oral Toxicity Up and Down Procedure in Rats, Jennifer Durando, March 7, 2007
	6	OPPTS 870.1200	ARY044415 SC - Acute Dermal Toxicity Study in Rats - Limit Test, Jennifer Durando, March 7, 2007

	7	OPPTS 870.1300	ARY044415 SC - Acute Inhalation Toxicity Study in Rats - Defined LC <sub>50</sub> , Jennifer Durando, March 7, 2007
	8	OPPTS 870.2400	SRY044415 SC - Primary Eye Irritation Study in Rabbits, Jennifer Durando, March 7, 2007
	9	OPPTS 8700.2500	SRY044415 SC - Primary Skin Irritation Study in Rabbits, Jennifer Durando, March 7, 2007
	10	OPPTS 870.2600	SRY044415 SC - Dermal Sensitization Study in Guinea Pigs (Buehler Method), Jennifer Durando, March 7, 2007
	11	OPPTS 870.1100	ARY044416 G - Acute Oral Toxicity Up and Down Procedure in Rats, Jennifer Durando, March 26, 2007
	12	OPPTS 870.1200	ARY044416 G - Acute Dermal Toxicity Study in Rats - Limit Test, Jennifer Durando, March 23, 2007
	13	OPPTS 870.1300	ARY044416 G - Acute Inhalation Toxicity Study in Rats - Defined LC <sub>50</sub> , Jennifer Durando, March 23, 2007
	14	OPPTS 870.2400	SRY044416 G - Primary Eye Irritation Study in Rabbits, Jennifer Durando, March 23, 2007
	15	OPPTS 8700.2500	SRY044416 G - Primary Skin Irritation Study in Rabbits, Jennifer Durando, March 23, 2007
	16	OPPTS 870.2600	SRY044416 - Dermal Sensitization Study in Guinea Pigs (Buehler Method), Jennifer Durando, March 23, 2007

Submitted By:

Doina Bujor  
Regulatory Manager  
Arysta LifeScience North America  
15401 Weston Pkwy. Suite 150  
Cary NC 27513  
Tel. 919-678-4879

Signature

Date

3/30/07



United States  
Environmental Protection Agency  
Washington, DC 20480  
**Formulator's Exemption Statement**  
(40 CFR 152.85)

Applicant's Name and Address  Arysta LifeScience North America Corporation 15401 Weston Parkway, Suite 150 Cary, NC 27513	EPA File Symbol/Registration Number 66330-
	Product Name ALOFT LC G Insecticide
	Date of Confidential Statement of Formula (EPA Form 8570-4) 03/28/2007

As an authorized representative of the applicant for registration of the product identified above, I certify that:

- (1) This product contains the following active ingredient(s):

Clothianidin  
Bifenthrin

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.60(e)(2) or (3).

- (3) Indicate by checking (A) or (B) below which paragraph applies:


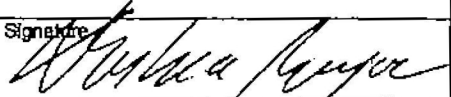
- ☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- ☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Clothianidin Bifenthrin	 PRODUCT INGREDIENT SOURCE INFORMATION IS NOT INCLUDED	
Signature 	Name and Title Doina Bujor / Regulatory Manager	Date 03/29/2007

EPA Form 8570-27 (Rev. 08-2004)

Copy 1 - EPA  
Copy 2 - Applicant copy



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**1200 Pennsylvania Avenue, N.W.**  
**WASHINGTON, D.C. 20460**

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Aryste LifeScience North America, 15401 Weston Pkwy, #150, Cary, NC 27513, 919-678-4900	EPA Registration Number/File Symbol 66330-368
Active Ingredient(s) and/or representative test compound(s) Clothianidin and Bifenthrin	Date March 29, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial non-food	Product Name ALOFT LC G Insecticide

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT (Check one method only)**

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

**SECTION II: GENERAL OFFER TO PAY**

(Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements)

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

*Doina Bujor*

Date

3-29-2007

Typed or Printed Name and Title

Doina Bujor / Regulatory Manager



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date	March 28, 2007	EPA Reg. No./File Symbol	66330-	Page 1 of 2	
Applicant's/Registrant's Name & Address:		Product			
Arysta LifeScience North America Corporation, 15401 Weston Pkwy., Suite 150, Cary, NC 27513		ALOFT™ LC G Insecticide			
Ingredient(s): Clothianidin, CAS # 210880-92-5 and Bifenthrin, CAS # 82657-04-3					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>PRODUCT CHEMISTRY DATA</b>					
830.1550	Product Identity and Composition		Arysta LifeScience Corp.	OWN	
830.1600	Description of Materials used to Produce Product		Arysta LifeScience Corp.	OWN	
830.1620	Description of Production Process		Arysta LifeScience Corp.	OWN	
830.1650	Description of Formulation Process		Arysta LifeScience Corp.	OWN	
830.1670	Discussion of Formation of Impurities		Arysta LifeScience Corp.	OWN	
830.1700	Preliminary Analysis		Arysta LifeScience Corp.	OWN	
830.1750	Certified Limits		Arysta LifeScience Corp.	OWN	
830.1800	Enforcement Analytical Method		Arysta LifeScience Corp.	OWN	
830.1900	Submittal of Samples		Arysta LifeScience Corp.	OWN	
830.6302	Color		Arysta LifeScience Corp.	OWN	
830.6303	Physical State		Arysta LifeScience Corp.	OWN	
830.6304	Odor		Arysta LifeScience Corp.	OWN	
830.7000	pH		Arysta LifeScience Corp.	OWN	
830.7300	Density / Relative Density / Bulk Density		Arysta LifeScience Corp.	OWN	
830.6314	Oxidation / Reduction: Chemical Incompatibility		Arysta LifeScience Corp.	OWN	

Signature

*[Handwritten Signature]*

Name and Title:

Doina Bujor/Regulatory Manager

Date

03-28-2007



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## DATA MATRIX

[illegible]

Signature

**Name and Title:**

**Doina Bujor/Regulatory Manager**

Date \_\_\_\_\_

03-28-2007

1. The Board  
of Directors  
of the Corporation  
has authorized the  
issuance of shares of  
common stock of the  
Corporation.

2. The Board  
of Directors  
has authorized the  
issuance of shares of  
common stock of the  
Corporation.



Regd 66330-368

Page \_\_\_\_\_ is not included in this copy.

Pages 59 through 60 are not included in this copy.

The material not included contains the following type of information:

- ☐ Identity of product inert ingredients.
- ☐ Identity of product impurities.
- ☐ Description of the product manufacturing process.
- ☐ Description of quality control procedures.
- ☐ Identity of the source of product ingredients.
- ☐ Sales or other commercial/financial information.
- ☐ A draft product label.
- ☒ The product confidential statement of formula.
- ☐ Information about a pending registration action.
- ☐ FIFRA registration data.
- ☐ The document is a duplicate of page(s) \_\_\_\_\_.
- ☐ The document is not responsive to the request.
- ☐ Internal deliberative information.
- ☐ Attorney-Client work product.
- ☐ Claimed Confidential by submitter upon submission to the Agency.

The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.